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SENT VIA EMAIL: bailey.axe@phila.gov

Bailey Axe, Esquire
Deputy City Solicitor
City of Philadelphia – Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

RE: Alfonse Bowman v. City of Philadelphia, et al.
No. 22-2037

Dear Ms. Axe:

This letter is in reference to my outstanding request for production of documents in the above-captioned matter. A scheduling order was issued by Judge Quinones on September 1, 2022. The order provides for a discovery deadline of January 31, 2022.

On August 15, 2022, I sent you a request for production of documents. In summary the request included the names and assignments of all police officers deployed on the evening of October 27, 2020 in the West Philadelphia area in response to the Walter Wallace protest activity, a description of the protocols, plans of actions put in place, and instructions given to officers before they were deployed on the evening of October 27, 2020 in the West Philadelphia area in response to the Walter Wallace protest activity.

This request included any and all use of force memos that were prepared by police officers and supervisors from the evening of October 27, 2020 in the West Philadelphia area, along with any 75-48 reports, 75-49 reports, and any after-action report prepared by Philadelphia Police Department, or prepared by any other agency and provided to the Philadelphia Police Department.

In addition to the above referenced requests, I also requested that you identify the officers that appeared in the video provided by the Plaintiff through the Initial Disclosures by name and badge number, along with the facial recognition software utilized by the Philadelphia Police Department to identify suspects in criminal cases. In conjunction I requested that the this facial recognition software be applied to the video and still photos that were provided by

Exhibit 2

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Plaintiff's Counsel in an effort to identify the Defendant Philadelphia Police Officer responsible for shattering Mr. Bowman's face.

Along with the Request for Production of Documents, I sent you initial disclosures on August 15, 2022 (Bates No. 00001-00944). On September 28, 2022, I issued a letter indicating that it had been over thirty (30) days since my initial request was delivered, and that I had yet to receive anything in response.

On October 20, 2022, we agreed to enter in to a tolling agreement for two years while you work to identify the two John Doe Philadelphia Police Officers in connection with this matter. At the time we agreed to the tolling agreement, we discussed the possibility of extending the discovery deadline. I am open to filing a request to extend the discovery deadline.

Please contact me upon receipt of this letter.

I appreciate your prompt attention to this matter.

Sincerely,

/s/ Paul J. Hetznecker

Paul J. Hetznecker

PJH/yjl